

EXHIBIT B

(Affidavit of Linda Nalley)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re : Chapter 11
:
SEARS HOLDINGS CORPORATION., et al.,¹ : Case No. 18-23538-RDD
:
Debtors. : (Jointly Administered)
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**AFFIDAVIT OF LINDA NALLEY IN SUPPORT OF OBJECTION TO NOTICE OF
REJECTION OF CERTAIN UNEXPIRED LEASES OF NON-RESIDENTIAL REAL
PROPERTY AND ABANDONMENT OF PROPERTY IN CONNECTION THEREWITH**

I, Linda Nalley, being first duly sworn on oath, state as follows:

1. This affidavit is being submitted in support of Demetrios L. Kozonis c/o Mega Properties, Inc.'s Objection to *the notice of rejection of certain unexpired leases of nonresidential real property and abandonment of property in connection therewith* [DE 1076] (the "Rejection Notice") filed by Sears Holdings Corporations, et al. (the "Debtors").
2. I am an employee of Mega Properties, Inc. and the Property Manager for Demetrios L. Kozonis c/o Mega Properties, Inc.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax Identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

3. The principal office for Mega Properties, Inc. is 4849 N. Milwaukee Ave, Ste 302, Chicago, IL 60630.
4. My office is located at 4849 N. Milwaukee Ave, Suite 302, Chicago IL 60630.
5. The office of Demetrios L. Kozonis is also located at 4849 N. Milwaukee Ave, Chicago, Illinois 60630.
6. I am charged with receipt, distribution, handling, and processing of all incoming mail for 4849 N. Milwaukee Ave, Suite 302, Chicago, IL 60630, including mail directed to Demetrios L. Kozonis and Mega Properties, Inc.
7. I, through Mega Properties, Inc., manage the Lease between Demetrios L. Kozonis and Sears, Roebuck and Co. pertaining to the real property at 7310 W. 87th St., Bridgeview, IL 60455, identified in [DE 1076] as Store Id 8350 (the "Store 8350").
8. I had been in prior email contact initiated by Charlotte Taylor of Sears Holding Corporation pertaining to the Store 8350. Patricia A. Bradley and Madrid Reed were copied on the email. See Attached Exhibit C. (November 13, 2018 email from Charlotte Taylor).
9. On December 4, 2018 I emailed Charlotte Taylor of Sears Holding Corporation inquiring as to the goings on at Store 8350. The email carbon copied Patricia. A. Bradley and Madrid Reed. See Ex. C. (December 4, 2018 email to Charlotte Taylor).
10. I did not receive an email response or a phone call from Charlotte Taylor, Patricia A. Bradley, or Madrid Reed.
11. I neither received, distributed, handled, nor processed the Rejection Notice filed by Debtors on December 6, 2018.
12. On or around December 6, 2018 I received a rent payment from Sears in the amount of \$20,558.54 for December 2018 rent.
13. I did not receive a rent payment from Sears for January, February, March, or April 2019.
14. On December 13, 2018 I sent an email to Jan DiLorenzo of Sears Holding Company again inquiring as to what maybe happening concerning the space at Store 8350. See. Exhibit D. (December 13, 2018 email to Janet DiLorenzo).
15. The December 13, 2018 email was a follow up to a voice mail I had left for Janet DiLorenzo.
16. I did not receive any responses from Janet DiLorenzo or any other Sears representative.

17. On or around January 4, 2019, I placed phone calls to Sears Holding Company to their corporate number, 1-847-286-2500, to further inquire as to Store 8350. I did not speak to a live person but left a message via voice-mail.
18. I never received a return phone call from any representative from Sears pertaining to the Store 8350.
19. On January 7, 2019, I again called Sears Holding Company at 1-847-286-2500 and this time spoke to an operator. The operator told me to speak to the Real Estate Department. I was transferred by the operator to a voice-mail where I left a message.
20. I never received a return phone call from any representative of the Sears Real Estate Department.
21. Store 8350 is secured using physical keys and not by any electronic or digitized entry system or codes.
22. No representative of Sears or any other person has ever returned or surrendered the keys for Store 8350.
23. I have never been contacted by any representative of Sears to notify me that I may re-let the premises.
24. No other person in the Mega Properties, Inc. office has been contacted by any representative of Sears with respect to 2019 rent, return of keys, or notice to re-let, pertaining to Store 8350.
25. Mr. Demetrios L. Kozonis has not been contacted by any representative of Sears with respect to 2019 rent, return of keys, or notice to re-let, pertaining to Store 8350.
26. During the month of January 2018, I became aware, through a member of our maintenance staff that Store 8350 did not seem to be in use.
27. Around the same time, also through a maintenance staff member, I became aware that there remained furniture in the store.
28. Having not received rent and in light of these circumstances, I sought to investigate our options and obligations.
29. By the middle of March 2019, having explored our legal obligations and options, and learning of the filed Rejection Notice, I instructed our maintenance staff to arrange for removal of the abandoned property.
30. On March 21, 2019, our maintenance staff was able to remove a portion of the abandoned property.

31. Our maintenance staff is scheduled to return on April 15th, 2019 to remove another portion of the abandoned property.
32. Following this, I will schedule for the removal of what I anticipate and hope will be the last portion of the abandoned property.

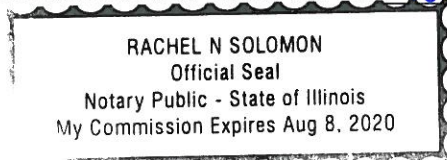
By signing this affidavit, under penalty of perjury, I acknowledge that all of the statements contained herein are true and accurate and that the Court may rely on the truth of each of these statements.


FURTHER AFFIANT SAYETH NOT:



Linda Nalley / Property Manager for Store 8350

Subscribed and sworn to before me this 10th day of April, 2019.





Notary Public

My Commission Expires: August 8, 2020